

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,  
AMAZON.COM SERVICES LLC, a Delaware  
limited liability company, and AMAZON  
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as  
“REKK,” and the following individuals:  
Domantas Radeckas, Noah Page, Skylar  
Robinson, Luke Colvin, Alejandro Taveras,  
Andrew Ling, Brandon Sukhram, Cosmin Sopca,  
Jenny Tran, Olaf Booij, and Ryan Bates,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT  
INJUNCTION AS TO  
DEFENDANT CHARALAMPOS  
GKATZOULAS AND ~~PROPOSED~~  
ORDER

NOTED FOR CONSIDERATION:  
July 8, 2024  
*without oral argument*

**STIPULATION**

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,  
Inc. (together, “Amazon”), and Defendant Charalampos Gkatzoulas (“Gkatzoulas”) and  
(collectively “Settling Parties”), by and through Amazon’s and Gkatzoulas’s respective counsel  
of record, notify the Court that the Settling Parties have reached a settlement of all claims

1 between them in this matter. Pursuant to the terms of that settlement, the Settling Parties  
2 stipulate and agree to entry of the permanent injunction below.

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DATED this 8th day of July, 2024.

Davis Wright Tremaine LLP  
*Attorneys for Plaintiffs*

Charalampos Gkatzoulas  
*Pro Se, Defendant Charalampos Gkatzoulas*

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By s/ Charalampos Gkatzoulas  
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**PERMANENT INJUNCTION**

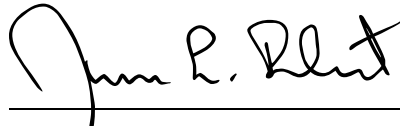
Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that Defendant Charalampos Gkatzoulas, and his respective employees, agents, successors and assigns, and all others in active concert or participation with him, are permanently enjoined and restrained from:

1. Accessing and using, whether directly or indirectly via a third party, intermediary, or proxy, Amazon.com, or any other Amazon online store around the world;
2. Exploiting or abusing Amazon's ordering or return services;
3. Making false statements or misrepresentations to Amazon;
4. Engaging in any activity that defrauds Amazon into paying money or providing replacement products for illegitimate returns;
5. Engaging in any scheme or malicious activity that interacts with Amazon; and
6. Knowingly and materially assisting or engaging any other person or business entity in engaging in or performing any of the activities listed above.

1 The Court shall retain continuing jurisdiction over this matter for the limited purposes of  
2 enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent  
3 Injunction.

4 IT IS SO ORDERED.

5 DATED: July 9, 2024.

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9 The Honorable James L. Robart  
10 UNITED STATES SENIOR DISTRICT JUDGE  
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